

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

In the matter of the Complaint of MORAN)	Civil Action No.: 2:18-cv-02396-DCN
ENVIRONMENTAL RECOVERY, LLC,)	
as the owner of the vessel "Miss June" and)	
her engines, tackle, appurtenances, etc.)	INTERROGATORIES TO CLAIMANT
)	ESTATE OF EDWARD BARNETT
For exoneration from, or limitation of,)	
liability,)	
_____)	

TO: BROOKLYN A. O'SHEA, ESQUIRE
CHRISTOPHER J. MCCOOL, ESQUIRE
COUNSEL FOR CLAIMANT ESTATE OF EDWARD BARNETT

Pursuant to Rule 33, F.R.C.P., you are required to fully answer the following Interrogatories within thirty (30) days from the date of service and to serve a copy of your answers upon the undersigned counsel at 1819 Meeting Street Road, Suite 150, Charleston, South Carolina, 29405.

These Interrogatories shall be deemed continuing so as to require that your answers be supplemented in accordance with Rules 26(e) and 33(b), F.R.C.P.

INSTRUCTIONS

If you refuse to respond fully to any Interrogatory, or part thereof, under any claim of privilege, please specifically set forth the basis for your refusal.

If you produce business records pursuant to Rule 33(c) in lieu of answering any Interrogatory, specify in writing the business records from which the answer to the Interrogatory can be derived or ascertained in response to the Interrogatory.

DEFINITIONS

The terms "you," "your," and "Claimant" shall embrace and include the Estate of Edward Barnett, and any and all agents, servants, representatives or other person or entity who has obtained information or acted for or on behalf of the Estate of Edward Barnett.

As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request any documents which might otherwise be construed to be outside its scope.

The term "identify", when used in conjunction with the term "person" shall embrace and include full names, residence and business addresses, residence and business telephone numbers, titles and places of employment.

The term "relate to" as to any given subject means any document that makes more or less probable, constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any way pertinent to the subject identified, including, without limitation, documents concerning the preparation of other documents. "Relate to" does not mean documents that have no bearing on the subject identified and to the extent those documents have no potential bearing on this litigation as limited by the scope of discovery, production of any such documents is not requested.

In these Interrogatories, the singular shall include the plural; the plural shall include the singular; the masculine shall include the feminine; and the feminine shall include the masculine.

INTERROGATORIES

1. Please list all assets and liabilities of Edward Barnett immediately prior to his death.

Please include all assets and liabilities, whether or not the same are inclusive in the probate estate.

2. Please identify all banking or lending institutions in which Edward Barnett maintained an account for the 3 years prior to his death, and include each account number.

3. For the 3 years prior to the death of Edward Barnett, please list all pecuniary support he provided to Penny J. Barnett or any other dependent, including the date, amount, and source.

4. Please identify all banking or lending institutions in which Penny J. Barnett maintained an account for the 3 years prior to the death of Edward Barnett, and include each account number.

5. For the 3 years prior to Edward Barnett's death, please list all pecuniary support Penny J. Barnett provided to Edward Barnett including the date, amount, and source.

6. For the 5 years prior to the death of Edward Barnett, please list all sources of income, whether cash, check, or otherwise, earned by Edward Barnett and Penny J. Barnett and include the annual amount of each source.

7. Did Edward Barnett have insurance on his life? If so, please state the date the policy was commenced, all beneficiaries that have been listed over its history, the amount of insurance, and identify the beneficiary that ultimately received the life insurance proceeds.

8. Did Edward Barnett have conscious pain and suffering after the subject accident? If so, please list all episodes of consciousness that Edward Barnett had from the time of the accident to the time of death. Please include the specific date and time of consciousness, duration of consciousness, any witness to said consciousness, and identify any supporting document for your answer.

9. Did Edward Barnett ever have a retirement plan, portfolio, or calculation performed to address his income during retirement? If so, identify who performed said plan or calculation.

10. Identify with name, address and phone number all pharmacies that Edward Barnett used for filling prescriptions from 2013 to the date of death.

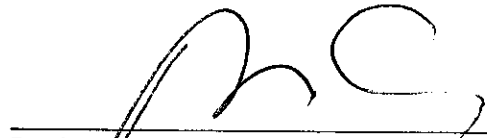
11. Had Edward Barnett, at any time ten (10) years prior to the accident which is the subject of this lawsuit, ever consulted any psychiatrist, psychologist, or any person claiming to give psychiatric aid or advice? If so, state the names and addresses of the psychiatrists, psychologists, or persons consulted, the dates of consultations, and the purpose of each such consultation.

12. Please identify each employer of Edward Barnett for the previous ten (10) years, and include the dates of employment, annual income and reason for termination of employment.

13. Had Edward Barnett been prescribed any medication for the 5 years prior to his death? If yes, please identify the prescribing physician, and provide the name and dose of the prescription.

14. Please identify all physicians that have treated Edward Barnett in the last 10 years, and include the ailment treated.

TECKLENBURG & JENKINS, LLC



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COUNSEL FOR PLAINTIFF-IN-LIMITATION

Charleston, South Carolina

February 21, 2019